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September 9, 2024

VIA ECF

The Honorable Kimba M. Wood
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Nkansah v. United States of America, 18-cv-10230 (PAC) (SLC)

Dear Judge Wood:

The undersigned represents Plaintiff Felix Nkansah in the above-referenced action and I write to the Court to update the Court on developments in the case regarding my continued representation of the Plaintiff. Accordingly, the Plaintiff suffered shock and distress as a result of the anxiety caused in him by Cassandra Synder, the mother of his child and the target of a deposition subpoena by the Government. Ms Synder was a victim of a stabbing in the chest and suffered severe trauma as result of that incident and remains in an extremely fragile state presently. Plaintiff who already suffers from PTSD as a result of the actions of the defendants, was apparently triggered by the anxiety caused to Ms. Synder and unbeknownst to Counsel on August 23, 2024 mailed a letter to the Court regarding his anxiety over Ms Synder suffering under an uncontrolled deposition by the defendants where he also addresses his concern over present counsel's representation.

Plaintiff's counsel was totally shocked when defense counsel emailed me on September 4th 2024 regarding the cancellation of the non-party deposition and included a copy of the letter attached to the email. Plaintiff apparently, had also provided the letter to Ms. Snyder in the hopes of having her calm down so as to end the anxiety she was causing him and Ms. Synder attached the same in her correspondence with the government's counsel.

As such the letter appeared to call into question Plaintiff's counsel's continued representation and accordingly, Counsel made all attempts to reach his client from September 4, 2024 to the present. This morning, I contemplated withdrawing and discussed same with Defense counsel. However, Plaintiff reached out to counsel at approximately 1pm today and indicated that he was under duress and shock and was unable to cope with the anxiety generated by Ms Synder. He has called his psychologist Dr. Lucas and has an appointment to see him on September 25, 2024 at 11am. Today, he also went to the Corning Mental Health for the anxiety and was prescribed high blood pressure, antipsychotic and antidepressant medication.

Mr. Nkansah has indicated to me that he wishes for me to continue as counsel and that his actions were the product of his PTSD and related anxiety. As such given the circumstances described above, Plaintiff's counsel respectfully avers that should this Honorable Court require it, Plaintiff's counsel is amenable to a conference to discuss this matter before the Court. I thank the Court for its attention to this matter.

/S/

Rehan Nazrali Esq

cc: (via ECF) Carly Wienreb, Counsel for Defendant